

Statement of the Connecticut Clean Energy Fund Regarding Raised Bill 5785 An Act Concerning Solar Panel Rebates

The Connecticut Clean Energy Fund (CCEF) strongly opposes R.B. 5785 An Act Concerning Solar Panel Rebates due to concerns about homeowner safety and exposure of liability to CCEF. Under the Solar PV Rebate Program, the CCEF requires that consumers use installers who have been pre-approved by CCEF. These eligible installers familiarity and understanding of the National Electrical Code as it pertains to PV systems is critical to insuring a safe installation. The grounding and wiring requirements for PV systems differ significantly from standard 110/220 VAC wiring, and if not followed carefully can produce hazardous (even lethal) conditions under commonly-encountered conditions. For this reason, CCEF hires qualified inspectors to inspect every PV system installed under its programs. Even with experienced installers, errors have been found which could lead to safety issues, and which have required immediate remediation.

The State of Connecticut has specific requirements for installers of solar PV systems. A good summary is found at:

http://www.dsireusa.org/library/includes/incentive2.cfm?Incentive_Code=CT02R&state=CT&CurrentPageID=1&RE=1&EE=1

- The Connecticut Department of Consumer Protection is authorized to issue licenses for solar-thermal work, solar-electric work and wind-electric work. As of January 2007, the PV-1 Limited Solar Electric Contractor license and the PV-2 Limited Solar Electric Journeyperson license are available. The holder of the PV-1 license may perform solar electricity work. The requirements to qualify for this license examination are two years of work as a solar journeyperson or equivalent experience and training.
- The holder of the PV-2 license may perform solar electricity work only while in the employ of a licensed electrical contractor. The requirements to qualify for this license examination are the completion of a registered apprenticeship program or equivalent experience and training.
- There are no state-sponsored training programs for solar contractors. Training and apprentice programs are available through independent trade schools and labor unions. License applications and instructions are available on the program web site.

To further protect homeowners, the Connecticut Clean Energy Fund has established its own requirements for PV residential installations. Installers are granted "Eligible PV Installation" status through a Request for Qualification (RFQ) process on an ongoing basis. Through its qualification requirements, the CCEF seeks to assure high quality and safe installations. These companies have the appropriate credentials, training, experience,

insurance and financial resources to install PV systems in our state. In addition, since CCEF pays the rebate directly to the installer on behalf of the electric ratepayers, these installers have agreed to abide by CCEF program rules. Eligible Installers are established using the following prerequisites:

- ⇒ A licensed electrical contractor (E-1) or PV-1 must perform the electrical work on the PV installation.
- ⇒ The company must have a "Qualified Installer" on its staff. A "Qualified Installer" is an installation supervisor who has taken a PV installation training course and has completed at least 3 installations as the lead installer, or 10 jobs as an apprentice.
- ⇒ The company must carry at least \$1 million in general liability insurance and demonstrate the capacity to withstand the cash-flow requirements created by the program's payment schedule.
- ⇒ Out-of state applicants who meet the above requirements, but lack experience installing PV systems in Connecticut, are granted probationary status at CCEF's discretion. Such applicants must complete between 5 and 10 PV installations in Connecticut and demonstrate their capacity to provide strong customer relations and support for Connecticut consumers.

At the current time CCEF has selected 24 highly qualified professionals to assist Connecticut ratepayers in the installation of their solar PV systems. CCEF staff is confident that this approach will ensure that public funds are not provided to an installation company or individual lacking the required professionalism, financial responsibilities and technical expertise. Other states such as New York and New Jersey also have eligibility standards to protect their ratepayers by requiring new installers to provide proof of experience and good credentials, as well as other criteria.

One of CCEF's stated objectives is to develop a robust, professional infrastructure to support a healthy PV industry in Connecticut, and requiring adequate levels of protection for homeowners is a key element in our program. In the late '70's and early 80's, fueled by generous federal incentives under the Public Utility Regulatory Policy Act (PURPA), dozens of small companies were established to install solar thermal (hot air or hot water) systems. Many of these systems were poorly engineered, improperly installed and imperfectly maintained, giving the industry a taint that lasted for decades. We are proud to say that with over 330 residential installations thus far and in part because of the eligibility requirements imposed by CCEF on installers who wish to participate in our rebate program, Connecticut's PV industry is growing rapidly, with a high degree of customer satisfaction, and with no safety-related events. Opening this market up to untrained installers would be a major step backward, and would endanger the entire industry.